IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

SHARON HAILEY	**CASE NO. 3:15-06350**
2700 HYDES FERRY ROAD	**CHAPTER 13**
NASHVILLE, TN 37218	**JUDGE MASHBURN**
Debtor	
SSN: xxx-xx-1771	

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: ***June 15, 2017.*** **IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE:** ***July 5, 2017, 8: 30A.M, Court Room 1, 2nd Floor Customs House, 701 Broadway, Nashville, TN 37203***

NOTICE OF MOTION FOR SUSPENSION OF PAYMENTS

The Debtor has asked the court for the following relief: **Debtor wishes to suspend her Chapter 13 plan payments.**

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before ***June 15, 2017***, you or your attorney must:

1. File with the court your written response or objection explaining your position. Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at: <https:ecf.tnmb.uscourts.gov>

   If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1st Floor, Nashville, TN (Monday – Friday, 8:00 A.M. – 4:00 P.M.)

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. ***THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.*** You may check whether a timely response has been filed by viewing the case on the court's web site at <www.tnmb.uscourts.gov>.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

Date: May 25, 2017

/s/ Mark Podis

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Mark R. Podis, #012216
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

SHARON HAILEY	**CASE NO. 3:14-06350**
2700 HYDES FERRY ROAD	**CHAPTER 13**
NASHVILLE, TN 37218	**JUDGE MASHBURN**
Debtor	
SSN: xxx-xx-1771	

MOTION FOR SUSPENSION OF PAYMENTS

Comes now the Debtor, by and through the undersigned counsel, and respectfully moves this Court for an order suspending her plan payments to the Chapter 13 Trustee for a period of three months, and in support thereof would show the following:

1. Debtor's Chapter 13 plan was confirmed by this Court on November 20, 2015.
2. Debtor is seeking a 3-month suspension of her plan payments because Debtor is having surgery and will be unable to work over the summer months.
3. Debtor's plan payment will increase to $250 bi-weekly, plus tax refunds after the proposed suspension to ensure a 60-month plan conclusion.
4. Debtor completed the Trustee's Financial Management Course on November 14, 2015.
5. The Debtor will forfeit her future Income Tax Refunds to the Chapter 13 Trustee for the remainder of her bankruptcy plan.
6. Debtor is also obligated to make all future payments in accordance with the confirmed Chapter 13 plan and should the Debtor fail to make any payment as required, this case will be dismissed upon filing notice by the Trustee, without further hearing.

STATEMENT OF IMPACT:

The unsecured creditors would continue to receive a minimum dividend of 1% as confirmed. Debtor's payment will increase to $250 bi-weekly after the proposed suspension to ensure a 60-month plan conclusion. The Debtor will forfeit her future Income Tax Refunds to the Chapter 13 Trustee for the remainder of her bankruptcy plan.

WHEREFORE, Debtor prays that

1. Debtor's plan payments to the Chapter 13 Trustee be suspended for 3 months.
2. Employer upon receipt of suspension order shall stop payroll deduction or any money remitted to the trustee by the employer shall be refunded by the trustee to the Debtor.
3. The unsecured creditors will continue to receive a minimum dividend of 1% as confirmed.
4. Debtor's plan payment will increase to $250 bi-weekly plus tax refunds after the proposed suspension to ensure a 60-month plan conclusion.
5. The Debtor will forfeit her future Income Tax Refunds to the Chapter 13 Trustee for the remainder of her bankruptcy plan.
6. Debtor is obligated to make all future payments in accordance with the confirmed Chapter 13 plan and should the Debtor fail to make any payment as required, this case will be dismissed upon filing notice by the Trustee, without further hearing.

Respectfully Submitted,

/s/ Mark Podis
Mark R. Podis, #012216
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been delivered to the U.S. Trustee, 701 Broadway, 318 Customs House, Nashville, TN 37203, and to the Chapter 13 Trustee, P.O. Box 340019, Nashville, TN 37203-0019, to the debtor, **Sharon Hailey,** 2700 Hydes Ferry Road, Nashville, TN 37218, **Insolve Auto Funding c/o Capital Recovery Group,** PO Box 64090, Tucson, AZ 85728-4090, **Capital Recovery Group,** 1790 E. River Road, Ste 101, Tucson, AZ 85718, **Inland Bank and Trust,** 2805 Butterfield Road, Ste 200, Oak Brook, IL 60523, on this 25th day of May, 2017. Copies have been sent via email CM/ECF http://ecf.tnmb.uscourts.gov.

/s/ Mark Podis
MARK R. PODIS

A TOTAL OF 34 COPIES HAVE BEEN MAILED FIRST CLASS TO CREDITORS ON ATTACHED MATRIX